

THE RAMEAU LAW FIRM

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August 16, 2016

**VIA ECF**

Hon. Peggy Kuo  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**RE: Alfonso Williams v. City, et. al., 15 CV 1367 (JBW)(PK)**

Your Honor:

I represent the plaintiff in the above-referenced action. I write with the consent of defendants to request an extension of time to complete discovery and a corresponding extension of all the other deadlines, including the identification of the case-in-chief experts. The parties have both requested extensions of discovery in the past. The parties request an additional 60 days to complete discovery from today's discovery deadline. The parties are scheduled to have a telephone conference with Your Honor on Friday, August 19<sup>th</sup> at 10:30 a.m. Because plaintiff will be before Your Honor at a 10:00 a.m. initial conference he requests that he appear in person for the conference while defense counsel still appears by phone.

At the last Court conference the parties informed the Court that the plaintiff had brought another case and that they would attempt to see if both cases could be resolved at once. It was the plaintiff's preference to seek an extension of discovery in this case to try to settle this case to avoid the expense of depositions. However, it does not appear likely that either case can settle quickly. The parties had attempted to depose at least one of the officers prior to the discovery deadline but due to counsel's conflicting schedules and pre-arranged vacations they were not able to do so.

Counsel have since conferred and have set aside the dates of August 24<sup>th</sup> and August 30<sup>th</sup> to conduct the depositions of four of the

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defendants. We are optimistic that with the initial time fact discovery can be completed.

I thank the Court for its consideration of this request.

Sincerely,



Alsaan Saleem

cc: Karl Ashanti, Esq.